

1 Rene L. Valladares
2 Federal Public Defender
3 Nevada State Bar No. 11479
4 *Emma L. Smith
5 Assistant Federal Public Defender
6 Illinois State Bar No. 6317192
7 411 E. Bonneville Ave., Ste. 250
8 Las Vegas, Nevada 89101
9 (702) 388-6577
10 Emma_Smith@fd.org

11 *Attorney for Petitioner Ronald Ross

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 Ronald Ross,
15 Petitioner,
16 v.
17 Dwight Neven, *et al.*,
18 Respondents.

Case No. 2:13-cv-01562-JCM-DJA

**Unopposed motion to extend
deadline to file Reply
(First request)**

1 Petitioner Ronald Ross respectfully moves this Court for an order extending
2 the time within which he must file a Reply to the State's Answer by 60 days from
3 December 6, 2019, up to and including February 4, 2020. This is his first request for
4 an extension of this deadline. Respondents, by counsel Michael J. Bongard, do not
5 object.

6 Undersigned counsel has been reviewing Mr. Ross's case in an effort to comply
7 with the Court's deadline. However, counsel respectfully submits that additional time
8 is necessary to properly prepare the Reply. Undersigned counsel has recently joined
9 the Federal Public Defender for the District of Nevada. Since beginning work in the
10 office approximately three months ago, counsel has been learning the eighteen cases
11 for which she has entered an appearance. In this time, she has been working
12 diligently to meet both past and upcoming deadlines for other clients, including in
13 *Young v. Baker*, No. 2:18-cv-00110-RFB-VCF (D. Nev.) (amended petition filed Oct.
14 23, 2019); *Dixon v. Dzurenda*, No. 79194 (Nev. S. Ct.) (opening brief due Dec. 13,
15 2019); *Davidson v. Neven*, No. 19-16952 (9th Cir.) (request for certificate of
16 appealability due Jan. 6, 2020); and *Mayo v. State*, No. 18-16081 (9th Cir.) (oral
17 argument on Jan. 24, 2020). Moreover, Counsel has been traveling and out of the
18 office to meet with clients, including on November 1, 8, 15, and 22. Counsel
19 respectfully represents that an additional 60 days is necessary to permit her to
20 prepare the Reply in this case.

21 This motion is not filed for the purposes of undue delay but in the interests of
22 justice and the interests of Mr. Ross. Counsel respectfully asks this court to grant
23 Mr. Ross's request to extend the time for filing a Reply by 60 days, until February 4,
24 2020.

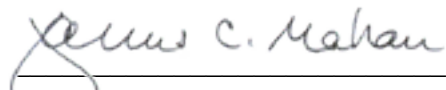
1 Dated December 4, 2019.

2 Respectfully submitted,

3
4 Rene L. Valladares
Federal Public Defender

5
6 /s/Emma L. Smith
Emma L. Smith
7 Assistant Federal Public Defender

8 IT IS SO ORDERED

9
10 
11 Dennis C. Mahan
United States District Judge

12
13 Dated: December 5, 2019

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2019, I electronically filed the foregoing with the Clerk of the Court for the United States District Court, District of Nevada by using the CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system and include: Michael J. Bongard.

I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing by First-Class Mail, postage pre-paid, or have dispatched it to a third party commercial carrier for delivery within three calendar days, to the following non-CM/ECF participants:

Ronald Ross
No. 1003485
Saguaro Correctional Center
1252 E. Arica Road
Eloy, AZ 85131

/s/ Jessica Pillsbury
An Employee of the
Federal Public Defender